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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:	§	
	§	CASE NO.: 17-41946-MXM-13
Melanie Joyce Kroonakress	§	CHAPTER 13
Debtor(s).	§	
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Melanie Joyce Kroonakress,	§	
Plaintiff,	§	
	§	
VS.	§	ADVERSARY NO.: _____
	§	
Higher Education Servicing Corporation,	§	
Texas Guaranteed Student Loan	§	
Corporation (TGSLC) d/b/a Trellis	§	
Company, Navient Solutions, LLC,	§	
National Collegiate Student Loan Trust	§	
2006-2, Ascendium Education Group, Inc.,	§	
and United States Department of Education	§	
Defendants.	§	

**PLAINTIFF'S COMPLAINT TO DETERMINE
DISCHARGEABILITY OF STUDENT LOANS**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Melanie Joyce Kroonakress, Debtor and Plaintiff in the above entitled and numbered cause (hereinafter referred to as "Plaintiff") and files this their Complaint to Determine Dischargeability of Student Loans (hereinafter referred to as "Complaint") complaining of Higher

Education Servicing Corporation, Texas Guaranteed Student Loan Corporation (TGSLC) d/b/a Trellis Company, Navient Solutions, LLC, National Collegiate Student Loan Trust 2006-2, Ascendium Education Group, Inc., and the United States Department of Education (hereinafter collectively referred to as “Defendants”) and in support of which would respectfully show the Court as follows:

STATEMENT OF FACTS

1. On May 8, 2017, Plaintiff filed a voluntary petition under Chapter 13 of Title 11 of the United States Code.

2. This Complaint arises in and relates to the Chapter 13 case of Melanie Joyce Kroonakress which was discharged on June 15, 2022.

3. Plaintiff can be served by and through her attorneys of record, Lee Law Firm, PLLC at the following address: 8701 Bedford Euless Rd., Suite. 510, Hurst, Texas 76053.

4. The Defendant Higher Education Servicing Corporation can be served by and through its registered agent for service of process, Phillip B Wambsganss, at the following address: 4381 W. Green Oaks Blvd., Suite 200, Arlington, TX 76016-4452.

5. The Defendant Texas Guaranteed Student Loan Corporation (TGSLC) d/b/a Trellis Company can be served by and through its registered agent for service of process, Cogency Global, Inc., at the following address: 1601 Elm St., Suite 4360, Dallas, TX 75201.

6. The Defendant Navient Solutions, LLC can be served by and through its registered agent for service of process, CSC-Lawyers Incorporating Service Company, at the following address: 211 E. 7th Street, Suite 620, Austin, TX 78701-4234.

7. The Defendant National Collegiate Student Loan Trust 2006-2 can be served by and through its officers or directors at the following address: 800 Boylston St., Fl 34, Boston, MA

02199.

8. The Defendant Ascendium Education Group, Inc. can be served by and through its registered agent for service of process, Business Filings Incorporated, at the following address: 701 Brazos Street, Suite 720, Austin, TX 78701.

9. The Defendant United States Department of Education can be served by serving its Secretary at the following address: General Counsel, U.S. Department of Education, 400 Maryland Avenue, SW, Washington, D.C. 20202; and by serving the United States Attorney General, Merrick Garland, at the following address: U.S. Department of Justice, 950 Pennsylvania Ave., NW, Washington, DC 20530-0001; and by serving the Office of the United States Attorney, Leigha Simonton at Burnett Plaza, Suite 1700, 801 Cherry Street, Unit 4, Fort Worth, TX 76102-6882.

10. Debtor would show that the Defendants are believed to be the current holders of various notes or loans made, insured, or guaranteed by a governmental unit, or made under a program funded in whole or in part by a governmental unit or nonprofit institution, or for an obligation to repay funds received as an educational benefit, scholarship or stipend owed by the Debtor.

11. Debtor would show excepting her student loan debt from discharge will impose and undue hardship on the debtor and/or the debtor's dependents.

12. Debtor would further show any of the Defendants may also hold private student loans which were subject to the General Discharge issued by the Court on June 15, 2022.

WHEREFORE PREMISES CONSIDERED, Plaintiff Melanie Joyce Kroonakress prays for all relief in law and in equity to which she may show herself entitled and for declaratory judgment regarding the dischargeability of the debtor's student loans.

Respectfully Submitted,

/s/ Jim Morrison

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